

To: JAMES D WALKER [Ex. 6 - Personal Privacy]
Jonathan.Koplos@cadmusgroup.com[Jonathan.Koplos@cadmusgroup.com]
Cc: Albright, David[Albright.David@epa.gov]; Rumrill, Nancy[Rumrill.Nancy@epa.gov]
From: Rao, Kate
Sent: Fri 12/16/2016 6:39:06 PM
Subject: FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit
EPA letter re Gunnison Copper Project Oct 2016.pdf

Hi Jonathan/Jim --

We just received a response from Excelsior addressing our Oct 2016 Notice Of Deficiency letter (see attached). Therefore, we need assistance under Task 4 for technical review (see below email thread for initial TDM).

Under Task 4 (Project Technical Review), the contractor shall provide technical review for revised/updated Excelsior Class III permit documentation and supporting material. The contractor shall incorporate any comments from EPA and shall provide a final draft to the EPA WACOR.

- o Material: Excelsior NOD response and Excelsior ADEQ APP supplement permit application.
- o Estimated LOE: [Ex. 4 - CBI]
- o Deliverable: Prepare written comments in a format agreed upon with Nancy during kick-off call (TBD)
- o Schedule:
 - Kick-off call: Nancy will coordinate with Jim but will target week of December 29th
 - Deliverable: written comments due week of January 9th
 - Call with Excelsior: Tentatively 1/24/2017 [Nancy will coordinate directly with Jim on call logistics.]

I plan to mail the material directly to Jim today. In addition to the NOD response, I will include a copy Excelsior's ADEQ APP supplemental permit application. There is info/material in the supplemental application that might be useful for your review of the NOD response.

Please let me know if you have any questions.

Kate

Kate Rao
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From: Rao, Kate
Sent: Wednesday, November 02, 2016 10:19 AM
To: Jonathan.Koplos@cadmusgroup.com
Cc: JAMES D WALKER <Ex. 6 - Personal Privacy> Albright, David
<Albright.David@epa.gov>; Rummel, Nancy <Rummel.Nancy@epa.gov>
Subject: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project
Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC
Permit

Hi Jonathan – below is a new work initiation request under Contract No. EP-C-15-022, WA 1-90 for
Excelsior. Please let me know if you have any questions. You have already confirmed that Jim will work
on this project so I am cc'ing him on this email.

Nancy is the tech lead on this project and she will cc: you and me on all call logistics and tech review
items.

See Task 5, section a. for info on upcoming call. I am still working out the logistics and will update you
when I get more information.

Thanks. Kate

Contract No. EP-C-15-022, Workplan Assignment No. 1-90

R9 Tech Support for Implementation of the UIC Program – Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ1-FY-16-1

Task 4 (Project Technical Reviews) & Task 5 (Consultation)

Technical Direction

Background: Excelsior Mining Company (Excelsior) has submitted a UIC area permit application to operate a Class III ISR copper mining facility in Chochise County, AZ.

On 3/24/2016, we issued a TDM requesting a technical review of Excelsior's Class III permit application. Cadmus submitted technical review comments on 6/8/2016 (see attached: Comments on the Excelsior Mining Arizona Gunnison Copper Project_6-8-2016.docx). EPA utilized these comments to issue the attached Notice of Deficiency on 10/14/2016 to Excelsior. Excelsior has requested a conference call with EPA Region 9 to discuss the NOD.

Under Task 5 (Consultation), the contractor shall make available a staff person to consult, directly with EPA staff and/or on calls with EPA & applicant, on the Excelsior Class III permit application and supporting material.

- Material: Will be sent prior to call or discussed on call.
 - Estimated LOE: Ex. 4 - CBI per call (includes prep time)
 - Deliverable: Summary of consultation support -- noted in monthly progress report and if possible, within 5 working days of the conference call, send draft notes to EPA via email.
- a. Call scheduled for Tuesday, November 8th from 8:30 am to 11:00 am. Pre-discussion and de-brief discussion may be requested (TBD) and will be organized by Nancy Rumrill as needed.
- Material to review 6/8/2016 Cadmus comments and 10/14/2016 NOD.
 - LOE Ex. 4 - CBI (includes prep and calls)

- Deliverable: written summary of consultation provided on call.

Under Task 4 (Project Technical Review), the contractor shall provide technical review for revised/updated Excelsior Class III permit documentation and supporting material. The contractor shall incorporate any comments from EPA and shall provide a final draft to the EPA WACOR.

- o Material: same as under Consultation Task and additional material as provided by the applicant.
- o Estimated LOE: **Ex. 4 - CBI** per review.
- o Deliverable: Prepare written comments in a format agreed upon when tech review is requested.
- o Schedule: 1 – 2 weeks for each request unless noted otherwise.

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